

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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JAN 26 1994
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of the Amateur Service)
Rules to Implement a Vanity Call)
Sign System.)

PR Docket No. 93-305

To: The Commission

REQUEST FOR EXTENSION OF TIME TO SUBMIT COMMENTS

The American Radio Relay League, Incorporated (the League), the national association of amateur radio operators in the United States, by counsel, hereby respectfully requests that the time in which comments may be filed in response to the Notice of Proposed Rule Making, FCC 93-545, released December 29, 1993, (the "Notice"), be extended for a period of forty-five days, to and including April 21, 1994. As good cause therefor, the League states as follows:

1. The League views the instant proceeding as one of great import to a large number of amateur radio operators. Amateur radio operators regard call signs as indicia of personal identity. The ability to choose one's call sign is at once a great opportunity for radio amateurs, and a difficult administrative process for the Commission. The allocation of a scarce resource, such as preferred call signs, raises distinct issues of fairness and other ancillary questions. Of particular concern is the establishment of a system of priorities for applicants for special call signs.

2. For the above reasons, the League has published the Notice in its entirety in QST, its monthly journal, and has made copies of

the Notice otherwise available to anyone who requests it. It has also formed a committee to advise the League's Board of Directors on the specifics of the implementation of a special call sign system that would be as fair as possible. The League requires time, beyond that available under the current comment deadlines, to evaluate the results of the input of its members following publication of the Notice, and thereafter for the adoption of a position on the matter and the preparation of comments. There is also legislation pending in Congress which may affect the means by which fees for special call signs should be charged by the Commission, and the amount thereof. This legislation may be resolved during the additional comment period.

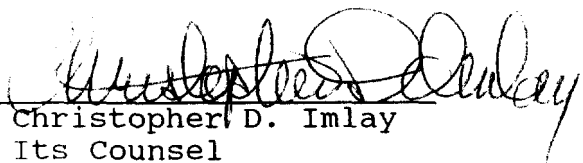
3. Nor is the additional time likely to cause any delay in the implementation of the program, or prejudice any party. The League does not **at all** intend to delay the implementation of a special call sign program. It is a most beneficial program, the legislative authority for which was the result of the League's efforts. However, the Commission is currently in the process of installing a new computer system at its Gettysburg office, and the additional comment period would permit time for the new system to become operational before resolution of this proceeding. It is thus not anticipated that the requested extension of the comment period will delay the implementation of a special call sign program.

Therefore, the foregoing considered, the American Radio Relay League, Incorporated respectfully requests that the Commission extend the comment period in this proceeding to and including April 21, 1994, and establish a reply comment date at a reasonable time thereafter.

Respectfully submitted,

THE AMERICAN RADIO RELAY
LEAGUE, INCORPORATED

By


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Its Counsel

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January 26, 1994

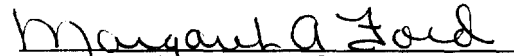
Certificate of Service

I, Margaret A. Ford, Office Manager in the law firm of Booth, Freret & Imlay, do certify that copies of the foregoing REQUEST FOR EXTENSION OF TIME TO SUBMIT COMMENTS were hand delivered this 26th day of January, 1994, to the offices of the following:

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